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Florene Davidson Oil Conservation Division 310 Old Santa Fe Trail Santa Fe, New Mexico 87503

> Application of Santa Fe Energy Operating Partners, L.P. for an Unorthodox Gas Well Location and To Amend Order No. R-9904, Lea County, New Mexico (Case No. 10,828)

Dear Florene:

Please find enclosed the original and two copies of a Pre-Hearing Statement for filing in the above-referenced case.

Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

HENSLEY

James Bruce

Enclosures

VIA HAND DELIVERY

2 2 1903 OIL CONSERVATION DI

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:



APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS, L.P. FOR AN UNORTHODOX GAS WELL LOCATION AND TO AMEND ORDER NO. R-9904, LEA COUNTY, NEW MEXICO.

CASE NO. 10,828

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

Santa Fe Energy Operating Partners, L.P. Suite 1330 500 West Texas Midland, Texas 79701 (915) 687-3551 Attention: C. Smith James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OPPOSITION OR OTHER PARTY

ATTORNEY

Pre-Hearing Statement NMOCD Case No. 10,828 Page 2

STATEMENT OF CASE

APPLICANT

Applicant force pooled the N½ of Section 18 - 20 South - 34 East, for a well to be drilled at an orthodox location. Subsequent to the entry of Order No. R-9904, the BLM informed Applicant that it would not approve the orthodox well location due to possible potash mineralization at that location. The BLM has since informed Applicant that it would approve a location 2,210 feet from the North and East lines of Section 18, which is near an existing well. As a result, Applicant requests approval of the unorthodox location and also requests that Order No. R-9904 be amended to permit the well to be drilled at said location.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

| | WITNESSES | EST. TIME | EXHIBITS |
|----|-------------------------|------------|--|
| 1. | Curtis Smith (Landman) | 10 minutes | (a) Land plat.(b) Letter from BLM.(c) Notice letter. |
| 2. | David White (Geologist) | 5 minutes | (a) Isopach of Morrow formation. |

Pre-Hearing Statement NMOCD Case No. 10,828 Page 3

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

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Attorneys for Santa Fe Energy Operating Partners, L.P.